

11936 Goya Drive
Potomac, Maryland 20854
February 8, 2018

Commissioners
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: REPLY COMMENTS TO ARRL ON PSHSB 17-344

Ladies and Gentlemen,

I am writing to urge the Commission to dismiss proposals made in both the RM and the WT noted above. The substance of these items were resubmitted by various parties during PSHSB 17-344.

While there is no question that wideband digital mode communications, particularly Winlink on amateur radio frequencies were of assistance along with more mainstream modes such as CW, RTTY, experimental digital modes such as JT65 and FT8, and SSB voice, it should be obvious that no particular communications mode is more valuable than any other during emergencies.

Particular issues that make wideband modes in narrowband HF frequencies incompatible with all other services, especially during emergencies:

Impede, Rather than Improve Emergency Communications: Unattended wideband modes, e.g., Winlink, require expensive equipment at both ends of the communications path. This equipment is available through a single manufacturer. This limits the number of stations that can deploy such a mode during an emergency. On the other hand, most amateur radio stations on either side of a communications channel during an emergency have the necessary equipment, available from a wide variety of manufacturers (and even home brewed equipment) to successfully communicate.

Not Efficient: Winlink wideband modes are not efficient. They consume limited HF frequencies dedicated to narrowband communications. In fact, these modes have a bandwidth footprint that is comparable to SSB voice bandwidth and therefore would be better located within those sub-bands, if anywhere.

Encryption: Winlink modes are encrypted modes. Encrypted transmissions are explicitly forbidden by Part 97. More germane at this point in time is that the Defense, Intelligence and

Law Enforcement authorities of the United States aggressively oppose any expansion of encrypted communications of any sort and this position is a vexed issue at the highest levels of government.

A corollary argument that has been put forward regards a putative need for encrypted communications to satisfy HIPAA privacy communications requirements. The Centers for Medicare and Medicaid Services, DHHS, which is responsible for HIPAA regulation and the Office of Civil Rights, DHHS, which is responsible for policing HIPAA compliance, do not classify amateur radio communications as Covered Entities under HIPAA. That means that such communications when used to exchange data regarding a patient are not subject to HIPAA regulations or the Privacy Act regarding protection of personally identifiable information. Any argument made on these grounds should be immediately dismissed as misleading.

Unavoidable Harm to Thousands of Active Operators: Winlink, indeed any unattended mode, interfere with ongoing narrowband communications in HF. This also is a violation of Part 97 regulations governing the behavior of amateur communications. When operating my amateur radio station I have experienced this on many occasions over the past 10 years. Narrowband communications modes are not compatible with the bandwidth demands of wideband digital modes. Tens of thousands of amateur radio operators will be unavoidably harmed if unattended and wideband digital modes are allowed free rein in narrowband HF frequencies. This is clearly not in the best interests of the amateur community.

Unnecessary Regulation: Finally, the Commission has the authority to direct waivers and special permissions to allow or disallow any communication and mode anywhere within the amateur frequency allocations during times of emergencies. There is no need for a regulation giving special privileges sought by special interests advancing their monopolistic mode on the basis of emergency communications service.

Sincerely,

Peter S. Alterman, Ph.D., W2CDO

ARRL Life Member since 1974

(former Deputy Associate Administrator for Technology Policy, GSA and former Chair, US Federal PKI Policy Authority)